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Filing date: **07/20/2015**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91220024
Party	Defendant City of Greenville
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Submission	Answer
Filer's Name	Susan Freya Olive
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Signature	/sfo/
Date	07/20/2015
Attachments	20150720 Answ-NOO.pdf(20190 bytes)

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
Before the Trademark Trial and Appeal Board
Opposition No: 91220024

Clif Bar & Company, Plaintiff-Opposer vs City of Greenville Defendant-Applicant	ANSWER TO NOTICE OF OPPOSITION
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Our Ref.: CIGR9001

Applicant responds to the Notice of Opposition herein as follows. Any allegation or inference not expressly admitted is denied.

1. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations asserted in this paragraph and therefore denies same, except that on information and belief, subject to Opposer's proof and to further discovery, it is admitted that Opposer, or another person or entity doing business under the name of Clif Bar & Company, offers sports/energy/nutrition products and other snack foods for sale to retailers in the food industry.

2. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations asserted in this paragraph and therefore denies same, except Applicant admits that a copy of what purports to be a Certificate of Registration bearing the identified registration number is attached as Exhibit A to the Notice of Opposition on the website of the Trademark Trial and Appeal Board although it was not included with the copy of the Notice served upon Applicant.

3. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations asserted in this paragraph and therefore denies same.

4. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations asserted in this paragraph and therefore denies same.

5. Applicant admits that Applicant filed an application bearing the identified serial number, which is the subject of the present Opposition. The application and its file history speak for

themselves as to their content and filing details, but appear in part to be accurately described. The description of services, however, presently reads as follows rather than as alleged:

Promotion of economic development, recreation, tourism, education, culture, municipal and civic interests, all in the City of Greenville, North Carolina, and all for the promotion of the interests of the City of Greenville, North Carolina and its residents.

Any further allegation or inference is denied.

6. Denied.

7. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations asserted in this paragraph and therefore denies same.

8. Denied.

9. Denied.

10. Denied.

11. Applicant admits that registration of Applicant's FIND YOURSELF IN GOOD COMPANY mark would presumptively entitle Applicant to prima facie exclusive ownership and rights to the composite FIND YOURSELF IN GOOD COMPANY mark in connection with "Promotion of economic development, recreation, tourism, education, culture, municipal and civic interests, all in the City of Greenville, North Carolina, and all for the promotion of the interests of the City of Greenville, North Carolina and its residents" in International Class 35. All remaining allegations are denied.

Wherefore, it is respectfully requested that the Opposition be denied in all respects, and dismissed with prejudice, and that Applicant's application be allowed to issue.

This 17th day of July, 2015.

OLIVE & OLIVE, P.A.

Attorneys for Applicant

/Susan Freya Olive/

Susan Freya Olive

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CERTIFICATE OF SERVICE

The undersigned certifies that a true copy of the foregoing document, together with any and all attachments thereto, has been served upon Opposer by depositing a true copy thereof, together with any and all attachments thereto, in the United States mail, first class postage prepaid, addressed to counsel for Opposer at his address provided in the Notice of Opposition, to wit:

William M. Bryner
Kirkpatrick Townsend & Stockton LLP
1001 West Fourth Street
Winston-Salem, NC 27701-2400

on this the 17th day of July, 2015.

/Susan Freya Olive/

Susan Freya Olive
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